

MAINE SECURITY BREACH REPORTING FORM

Pursuant to the Notice of Risk to Personal Data Act (Maine Revised Statutes 10 M.R.S.A. §§ 1346-1350-B)

Name and address of Entity that owns or maintains the computerized data that was subject to the breach:

Brennan Recupero Cascione Scungio and McAllister LLP

Street Address: 362 Broadway

City: Providence

State: RI

Zip Code: 02009

Submitted by: Ryan C. Loughlin Title: Partner Dated: 11/22/16

Firm Name (if other than entity): Mullen Coughlin LLC

Telephone: (267) 930-4786

Email: rloughlin@mullen.law

Relationship to Entity whose information was compromised: Attorney

Type of Organization (please select one): ☐ Governmental Entity in Maine; ☐ Other Governmental Entity;
☐ Educational; ☐ Health Care; ☐ Financial Services; * ☒ Other Commercial; ☐ Not-for-Profit

Number of Persons Affected:

Total (including Maine residents): 2266 Maine Residents: 8

If the number of Maine residents exceeds 1,000, have the consumer reporting agencies been notified? ☐ Yes; ☐ No.

Dates: Breach Occurred: 8/15/2016 Breach Discovered: 8/15/2016 Consumer Notification: 11/22/2016

Description of Breach (please select all that apply):

☐ Loss or theft of device or media (e.g., computer, laptop, external hard drive, thumb drive, CD, tape);

☐ Internal system breach; ☐ Insider wrongdoing; ☒ External system breach (e.g., hacking); ☐ Inadvertent disclosure;

☐ Other (specify):

Information Acquired: Name or other personal identifier in combination with (please select all that apply):

☒ Social Security Number

☐ Driver's license number or non-driver identification card number

☐ Financial account number or credit or debit card number, in combination with the security code, access code, password, or PIN for the account

Manner of Notification to Affected Persons – ATTACH A COPY OF THE TEMPLATE OF THE NOTICE TO AFFECTED MAINE RESIDENTS:

☒ Written; ☐ Electronic; ☐ Telephone; ☐ Substitute notice.

List dates of any previous (within 12 months) breach notifications:

Identity Theft Protection Service Offered: ☒ Yes; ☐ No.

Duration: 1 year

Provider: AllClear ID

Brief Description of Service: credit monitoring and identity restoration services

*If reporting to Department of Professional and Financial Regulation, this form is not required. 10
M.R.S.A. § 1348(5)

PLEASE COMPLETE AND SUBMIT THIS FORM TO

Fax or E-mail this form to:

Maine State Attorney General's Office
SECURITY BREACH NOTIFICATION
Consumer Protection Division
111 Sewall Street, 6th Floor
Augusta, Maine 04330
Fax: 207-624-7730
E-mail: breach.security@maine.gov

Exhibit 1

We represent Brennan Recupero Cascione Scungio and McAllister LLP, 362 Broadway, Providence, Rhode Island 02009 (“Brennan Recupero”), and are writing to notify you of a data security incident that may affect the security of the personal information of eight (8) Maine residents. The investigation into this incident is ongoing and will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Brennan Recupero does not waive any rights or defenses regarding the applicability of Maine law or personal jurisdiction.

Nature of the Cyber Security Incident

On August 15, 2016, the credentials for a Brennan Recupero attorney were briefly used by an unauthorized individual to remotely access its computer network. The unauthorized access was quickly discovered and Brennan Recupero immediately reset all user passwords to the network to prevent any further access to the network. In addition, Brennan Recupero launched an internal investigation and retained third-party forensic experts to determine whether the unauthorized individual accessed any data within our network and if so, the extent of that access. Brennan Recupero determined that while the unauthorized individual or individuals had access to Brennan Recupero’s network, certain personal information was accessible and may have been viewed by the unauthorized individual including individuals’ names, Social Security number and address.

Notice to Maine Residents

On or around October 10, 2016, Brennan Recupero and its forensic experts completed a review of the files accessible to identify those whose information was accessible and the type of information related to these individuals that was contained in the accessible files. This review process involved both a programmatic and manual review of a variety of different file types to identify those who may be impacted. Given the complexity and volume of documents to be reviewed, this process took some time once the accessible files were identified. Brennan Recupero then moved to provide notice to the identified individuals who may be affected by this incident.

On November 22, 2016, Brennan Recupero began mailing notice letters to potentially affected individuals which includes eight (8) Maine residents. The notice will be provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken

Brennan Recupero is offering potentially affected individuals complimentary access to twelve (12) months of free credit monitoring and identity restoration services with AllClear ID. Additionally, Brennan Recupero is providing potentially affected individuals with information on how to protect against identity theft and fraud, including information on how to contact the Federal Trade Commission, the state attorney general, and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to you, Brennan Recupero is providing written notice of this incident to other state regulators where required.

Exhibit A

00259
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

00024
ACD1234

November 22, 2016

RE: Notice of Data Breach

Dear John Sample,

Brennan Recupero Cascione Scungio and McAllister LLP (“Brennan Recupero”) recently discovered an incident that may affect the security of your personal information. We write to provide you with information about the incident, steps taken since discovering the incident, and information on what you can do to better protect against the possibility of identity theft and fraud.

What Happened? On August 15, 2016, the credentials for a Brennan Recupero attorney were briefly used by an unauthorized individual to remotely access our computer network. The unauthorized access was quickly discovered and we immediately reset all user passwords to the network to prevent any further access to the network. In addition, we launched an internal investigation and retained third-party forensic experts to determine whether the unauthorized individual accessed any data within our network and if so, the extent of that access.

What Information Was Involved? We determined that while the unauthorized individual or individuals had access to Brennan Recupero’s network, certain of your personal information was accessible and may have been viewed by the unauthorized individual including your name, Social Security number and address.

What We Are Doing Brennan Recupero takes the security of your personal information very seriously. While we have no evidence your information was specifically impacted or that your information has been misused, we are offering you complimentary access to 12 months of free credit monitoring and identity restoration services with AllClear ID. The enclosed *Steps You Can Take To Protect Against Identity Theft and Fraud* contains instructions on how to enroll and receive these free services, as well as information on what you can do to better protect against identity theft and fraud. We are also notifying certain state regulators of this incident.

What You Can Do You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

For More Information You can call the call center we have set up for this incident at 1-855-865-6894. The call center is available Monday through Saturday, 9:00 a.m. to 9:00 p.m. E.S.T.



We take the privacy of your personal information seriously. We sincerely regret any inconvenience or concern this incident has caused you. The security of your information is a priority to us and we have taken precautionary measures to better prevent something like this from happening again.

Sincerely,

Benjamin M. Scungio

Benjamin M. Scungio

Ronald F. Cascione

Ronald F. Cascione

Steps You Can Take to Protect Against Identity Theft and Fraud

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-865-6894 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of credit, criminal, medical or employment fraud against children by searching thousands of public databases for use of your child's information. To use this service, you will need to provide your personal information to AllClear ID.

You may sign up online at enroll.allclearid.com or by phone by calling 1-855-865-6894 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
<https://www.freeze.equifax.com>

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
www.transunion.com/securityfreeze



You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6400, www.ncdoj.gov. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement. **Rhode Island residents**: the Attorney General's office can be contacted at <http://www.riag.ri.gov/index.php>, consumers@riag.ri.gov or (401) 274-4400. There were approximately 1102 Rhode Island residents affected by this incident.